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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

RESIDENTIAL CAPITAL, LLC., et al.

Debtors

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

**MOTION FOR EXTENSION OF TIME TO FILE CREDITOR'S OBJECTION TO
DEBTORS' TWENTY-SIXTH OMNIBUS OBJECTIONS TO CLAIMS AND MOTION
FOR CONTINUANCE OF HEARING THEREOF**

COMES NOW Karen Mitchell-Smith, appearing *pro se* on behalf of the Estate of Felecia V. Mitchell ("Estate"), Creditor, and respectfully MOVES this Court for both and Extension of Time to File the Estate's Objection to Debtors' Twenty-Sixth Omnibus Objections to Claims in the above-captioned Case until at least Tuesday, October 15, 2013 as well as a Continuance of the Hearing thereof so that this forthcoming Objection may be heard. Currently, there is a Hearing scheduled for Tuesday, September 24, 2013 at 10:00 A.M. The reasons for her Motions are cited below:

1. For reasons unknown, the attached Notice of Hearing on Twenty-Sixth Omnibus Objection to Claims, although dated August 16, 2013, was not received in the mail by Ms. Mitchell-Smith on behalf of the Estate until yesterday, Friday, September 20, 2013.
2. According to the attached Notice, any Objection needed to be filed and served by September 16, 2013. That date has obviously passed. Had Ms. Mitchell-Smith received

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the attached Notice of Hearing in a timely manner, she would most assuredly have filed and served an Objection on behalf of the Estate to Debtors' Motion on or before the September 16, 2013 deadline.

WHEREFORE, as the apparent failure to do so was in no way fault of her own, Karen Mitchell-Smith, appearing pro se on behalf of the Estate of Felecia V. Mitchell, does hereby respectfully MOVE this honorable Court for and extension of two weeks (14 days) from the upcoming Hearing date until Tuesday, October 8, 2013 in which to both file and properly serve an Objection. It is her sincere belief that such time will be sufficient for her to both research the issue and prepare an appropriate Objection.

1. A Hearing on this matter is scheduled for September 24, 2013 at 10:00 A.M. in New York City. Unfortunately, Ms. Mitchell-Smith will not be able to attend a Hearing on that date on behalf of the Estate. Ms. Mitchell-Smith currently is residing in Hampton, Georgia and is undergoing treatment in that area for several skin cancers. She has another procedure scheduled for the same date as the September 24, 2013 Hearing.

WHEREFORE, in light of her current cancer treatments, Karen Mitchell-Smith, appearing pro se on behalf of the Estate of Felecia V. Mitchell, does hereby respectfully and additionally MOVE this honorable Court for a Continuance of this Hearing until a date after the Estate's Objection has been filed and served (i.e., sometime after October 8, 2013).

Due to her ongoing cancer treatments, Ms. Mitchell is unable to appear pro se in New York City on behalf of the Estate on the following dates:

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September 16, 2013 thru October 2, 2013

October 13, 2013 thru October 21, 2013

October 30, 2013 thru November 4, 2013

November 9, 2013 thru November 23, 2013

Any other dated should be acceptable.

Respectfully submitted,



KAREN MITCHELL-SMITH

41 Rosedale Trace

Hampton, Georgia 30228

703-568-8124

Administratrix Appearing Pro Se

Date: September 21, 2013